



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



314008

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

Monday, September 24, 2007

Jennifer Hale  
Environment Health & Safety, WTC 2G2  
P.O. Box 9777  
Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site  
Comments: *Plainwell Mill Banks Emergency Action Design Report*

Dear Ms. Hale:

RMT, Inc. provided a copy of the *Plainwell Mill Banks Emergency Action Design Report* (CDR) on behalf of Weyerhaeuser to Region 5. On September 19, 2007, Region 5 received a request for expedited review and approval of site preparation activities, outlined in Section 2.2 of the CDR. Region 5 is providing comments and partial approval for the work described in Section 2.2 of the CDR.

Comments

1. Section 2.2.2 – Top of Bank Work Platform – During the construction/grading of the work platform, the movement of soil present on-site may also spread contamination existing on-site. Region 5 recommends either testing the soil prior to movement or using clean imported material to construct the work platform.
2. Section 2.2.3 – Page 8 - ¶ 3 – It is likely the outfalls will be incorporated into the *Remedial Investigation* (RI). Please take this into consideration during your design.
3. Section 2.2.4 – Page 8 - ¶ 5 – Please provide the reference "Consumers Energy, 2007."
4. Section 2.2.5 – Residuals Containment Area
  - 4a. The proposed location of the Residuals Containment Area (RCA) is the former aeration basin. The design for the RCA calls for use of topsoil from this area to be used as containment berms. This movement of this soil may also spread contamination existing on-site. Region 5 recommends either testing the soil prior to movement, or using clean imported material to construct the berms.

4b. No detailed design has been offered for the RCA. A detailed design must be provided.

5. Section 2.2.7 – A maintenance schedule should be provided for the wastewater treatment system. Additionally, Region 5 has concern over the limited capacity of the wastewater treatment system.

Region 5 also requests, if not already completed, Weyerhaeuser submit the necessary substantive requirement documents and work with the Michigan Department of Environmental Quality (MDEQ) to identify any procedures the Emergency Action must comply with.

Of the specific site preparation tasks cited in your letter of September 17, 2007, the following have been approved:

1. Mobilizing construction support equipment to site
3. Completing pre-excavation survey of the banks
4. Confirming outfall types and determining outfall management approaches
6. Installing water quality monitoring equipment
7. Staging of the on-site wastewater treatment unit
8. Establishing decontamination system
9. Implementing field and visitor health and safety procedures

Approval of specific site preparation tasks two (clearing of construction zones to allow preparation of the top of bank work platform) and five (constructing residuals containment area) are pending an adequate response to Comments 1 and Comment 4.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the task.

Sincerely,



Sam Chummar, Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division – Remedial Response Branch #1  
77 W Jackson Blvd. (SR-6J)  
Chicago, IL 60604

cc: Eileen Furey, C-14J  
James Saric, SR-6J  
Michael Berkoff, SR-6J  
Paul Bucholtz, MDEQ